

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE: }
} Case No. 19-32259-KLP
Melinda B. Dandridge }
} Chapter 13
} }
} Debtor }
Address: 9077 Fayemont Drive
Mechanicsville, Va. 23116

SSN: xxx-xx-7340

NOTICE OF MOTION

Melinda B. Dandridge, ("Debtor"), by counsel, has filed a Motion to Incur Debt, Motion to Expedite and Motion to Shorten Notice Period.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.

If you do not want the court the grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before you or your attorney must:

- ✓ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

**Clerk of Court
United States Bankruptcy Court
701 E. Broad Street, Room 4000
Richmond, VA 23219**

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
115 N. 1st Street
Richmond, VA 23219
(804) 644-4878 (T)
(804) 644-4874 (F)
jmassie@massielawfirm.com

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You must also mail a copy to:

Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125

✓ Attend a hearing scheduled for August 28, 2019 at 10 A.M. at Judge Phillips at 701 E. Broad Street, Room 5100, Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

/s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 9022-1, on August 19, 2019, the foregoing Notice of Motion has been served on and/or endorsed by all necessary parties.

August 19, 2019

RESPECTFULLY SUBMITTED

Melinda B. Dandridge

By: /s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
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IN RE:

Melinda B. Dandridge

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EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re: Melinda B. Dandridge
Debtor

Case Number 19-32259-KLP
Chapter 13

MOTION TO EXPEDITE HEARING

COMES NOW, Melinda B. Dandridge, the Debtor, by Counsel, and offer the following in support of her Motion to Expedite Hearing on the Motion for Authority to Incur Indebtedness:

1. On April 29, 2019 , Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § §1301 et seq.
2. Debtor seeks permission to have an Expedited Hearing on the Motion for Authority to Incur Indebtedness.
3. That an expedited hearing on the Motions are necessary for the following reason: Debtors Daughter needs transportation to school.
4. An expedited hearing is necessary under the circumstances and creditors and parties in interest will not be prejudiced by such expedited hearing being granted.

WHEREFORE, the Debtor respectfully request this Honorable Court to schedule a hearing to be heard on an expedited basis to consider the Motion for Authority to Incur Indebtedness and for such other and further relief as the Court deems proper.

August 19, 2019

RESPECTFULLY SUBMITTED,

Melinda B. Dandridge

By: /s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)

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In re: Melinda B. Dandridge
Debtor

Case Number 19-32259
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CERTIFICATION REGARDING REQUEST FOR EXPEDITED HEARING

In support of the attached request for an expedited hearing as required by Local Rule 9013-1(N), I hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing.
2. I have not created the emergency through any lack of due diligence, and
3. I have made a *bona fide* effort to resolve the matter without hearing.

August 19, 2019

RESPECTFULLY SUBMITTED,
Melinda B. Dandridge

By: /s/ Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 9022-1, on August 19, 2019, the foregoing Motion to Expedite Hearing has been served on and/or endorsed by all necessary parties.

August 19, 2019

RESPECTFULLY SUBMITTED

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
115 N. 1st Street
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IN RE:

Melinda B. Dandridge

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Case No. 19-32259-KLP

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By /s/: Joseph Massie, III
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In re: Melinda B. Dandridge
Debtor

Case Number 19-32259-KLP
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MOTION TO SHORTEN NOTICE PERIOD

COMES NOW, Melinda B. Dandridge, ("the Debtor"), by Counsel, and file this Motion to Shorten the Notice Period for the Motion for Authority to Incur Indebtedness pursuant to 11 USC §364(a) and 1304, Federal Rules of Bankruptcy Procedure 4001(c) and 9013, and Local Bankruptcy Rules 9013-1. In support thereof, Debtor respectfully states the following:

Jurisdiction

1. This court has exclusive jurisdiction over this matter pursuant to 28 USC §1334.
2. This proceeding is a core proceeding under 28 USC §157(b)(2)(A)(B)(K) and (O).
3. Venue is proper pursuant to 28 USC §1409.

Facts

4. On April 29th 2019 the Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § 1301 **et seq.**
5. Debtor seeks to shorten the notice period for the **Motion for Authority to Incur Indebtedness** from twenty-one (21) days to eight (8) days.

WHEREFORE, the Debtor prays that this Court enter an Order shortening the notice period for the **Motion for Authority to Incur Indebtedness**

August 19, 2019

RESPECTFULLY SUBMITTED,
Melinda B. Danridge

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
115 N. 1st Street
Richmond, VA 23219
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By: /s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 9022-1, on August 19, 2019, the foregoing Motion to Shorten Notice Period has been served on and/or endorsed by all necessary parties.

August 2, 2019

RESPECTFULLY SUBMITTED
Melinda B. Dandridge

By /s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
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IN RE:

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Debtor

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MOTION FOR AUTHORITY TO INCUR INDEBTEDNESS

COME NOW, the Debtor, Melinda B. Dandridge, by counsel, and in support of her request Motion for Authority to Incur Indebtedness, states as follows:

1. The Debtor is requesting authority to incur indebted with, for the purchase of 2013 Kia Soul or like vehicle in the approximate amount not to exceed \$5291.00, and with an interest rate not to exceed 22 %, (51 months) with monthly payments of \$ 177.50 per month.
2. Said purchase is necessary as the Debtor's Daughter needs transportation for school.
3. Said indebtedness will not impair the Debtor's ability to comply with the terms of Chapter 13 Plan.

WHEREFORE, the Debtor requests an Order authorizing them to incur said indebtedness and for such other relief as the Court may deem appropriate.

August 19, 2019

RESPECTFULLY SUBMITTED,
Melinda B. Dandridge

By: /s/ Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
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(804) 644-4874 (F)

CERTIFICATE OF SERVICE

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Acs/navient
C/o Acs
Utica, NY 13501

Aes / Wells
Attn: Bankruptcy
Po Box 2461
Harrisburg, PA 17105

AMCA/American Medical Collection Agency
Attention: Bankruptcy
4 Westchester Plaza, Suite 110

Elmsford, NY 10523
AR Resources, Inc.
Attn: Bankruptcy
Po Box 1056
Blue Bell, PA 19422

Bank of America
4909 Savarese Circle
F11-908-01-50
Tampa, FL 33634

BonSecours
Richmond Health System
P. O .Box 404893
Atlanta, GA 30384

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Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

Capital One Auto Finance
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

Comcast
PO Box 173885
Denver, CO 80217

Comenity Capital/Davids Bridal
Attn: Bankruptcy Dept
Po Box 182125
Columbus, OH 43218

Commonwealth Radiology
PO Box 4466
Woodbridge, VA 22194-4466

Consumer Portfolio Service
P.O. Box 98709
Phoenix, AZ 85038

Consumer Portfolio Svc
Attn: Bankruptcy
Po Box 57071
Irvine, CA 92619

Credence Resource Management
17000 Dallas Pkwy Ste 20
Dallas, TX 75248

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Credit One Bank
Attn: Bankruptcy Department
Po Box 98873
Las Vegas, NV 89193

ERC
8014 BAYBERRY RD
Jacksonville, FL 32256

First Premier Bank
Attn: Bankruptcy
Po Box 5524
Sioux Falls, SD 57117

I C System Inc
Attn: Bankruptcy
P.O. Box 64378
St. Paul, MN 55164

I C System Inc
Attn: Bankruptcy
Po Box 64378
St Paul, MN 55164

John P. Fitzgerald, III
Office of US Trustee Reg 4-R
701 E. Broad Street, Ste. 4304
Richmond, VA 23219

Lenoir Rhyne Univ
625 7th Avenue NE
Hickory, NC 28601

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LVNV Funding/Resurgent Capital
Attn: Bankruptcy
Po Box 10497
Greenville, SC 29603

Merrick Bank/CardWorks
Attn: Bankruptcy
Po Box 9201
Old Bethpage, NY 11804

Miramed Revenue Group
Attn: Bankruptcy
360 East 22nd Street
Lombard, IL 60148

Montgomery Lynch & Assoc
P.O. Box 22720
Beachwood, OH 44122

nhcash.com, LLC
169 South River Road
Suite 19
Bedford, NH 03110

Office of US Trustee
701 E. Broad Street
Suite 4300
Richmond, VA 23219

One Advantage
P.O. Box 23860
Belleville, IL 62223

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5 East Franklin St.
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Red Pine Lending
16161 Ventura Blvd
Encino, CA 91436

Rowe Rosen & Fitzhugh
1001 Boulders Parkway Ste 519
Richmond, VA 23225

Suzanne Wade
Chapter 13
PO Box 1780
Richmond, VA 23218-1780

US Department of Education/Great Lakes
Attn: Bankruptcy
Po Box 7860
Madison, WI 53707

US Department of Education/Great Lakes
2401 International Lane
Madison, WI 53704

Westcreek Fi
4951 Lake Brook Dr
Glen Allen, VA 23060

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